

United States Bankruptcy Court  
Eastern District of Virginia  
Alexandria Division

In re:

**Vyshnavi Infotech, Inc.,**

Case No. 15-10475-RGM

Debtor.

Chapter 11

**Motion to Convert Case to Chapter 7**

Comes Now, Judy A. Robbins, United States Trustee, and moves the Court to convert this case to a case under chapter 7 of the Bankruptcy Code. In support of this motion the following representations are made:

1. The Court has jurisdiction to hear and decide this matter. This is a core proceeding.
2. On February 10, 2015, the debtor filed a petition for relief under chapter 11 of the Bankruptcy Code.
3. On February 25, 2015, the Court entered the Consent Order, Docket No. 22, that required the debtor to file monthly financial reports and pay United States Trustee fees.
4. The monthly reports for June and July 2015 have not been filed.
5. The debtor has not paid fees due the United States Trustee for the second quarter of 2015.
6. The fee was due on July 31, 2015.
7. No disclosure statement and plan of reorganization have been filed.
8. Cause exists pursuant to Section 1112(b)(4) of the Bankruptcy Code to grant the requested relief: failure to obey an order of the Court; unreasonable delay in the administration of this case.

Wherefore, the United States Trustee moves the Court to dismiss or convert this case to chapter 7.

August 25, 2015

Judy A. Robbins  
United States Trustee

/s/ Jack Frankel  
Jack Frankel, Attorney  
Office of United States Trustee  
115 South Union Street  
Alexandria, VA 22314  
(703) 557-7229

Certificate of Service

I hereby certify that on the 25<sup>th</sup> day of August, 2015, I mailed, a copy of this motion to convert, first class, postage prepaid, United States mail, to the debtor's address of record and e-mailed a copy to the debtor's attorney

<b>Vyshnavi Infotech Inc.</b> 13800 Coppermine Rd Ste 159 Herndon, VA 20171	Ashley F. Morgan, Esq. The Law Office of Juan E. Milanes, PLLC 1831 Wiehle Ave., Suite 105 Reston, VA 20190 <a href="mailto:ashley.milaneslaw@gmail.com">ashley.milaneslaw@gmail.com</a>
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/s/ Jack Frankel  
Jack Frankel